

Before the Federal Communications Commission:

In the matter of	(Docket RM-11829
Amending the Amateur Radio Rules to add a	(
Tyro License Class, structuring part of the 70cm band,	(
expanding coordinating committee responsibility,	(
insuring amateur radio as the primary user of 430-440 MHz,	(
adding scientific research to the explicit purpose of	(
amateur radio and requiring governments to allow	(
amateurs reasonable access to government land to build	(
and maintain Amateur Radio Community Service	(
(ARCS) radio systems.	(

Supporting Comments of:

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As the Program Manager for the Community Emergency Response Team (CERT) in Longmont, Colorado and a licensed amateur radio operator I may see the issues presented by RM-11829 from an uncommonly informed perspective. In summary, the ARCS Initiative offers community service organizations, amateur radio and the public as a whole, significant opportunity: possibilities made practical by affordable advancing technology. Commission action can launch a new paradigm.

CERT is not alone. Virtually all community service organizations that work in teams at diverse decentralized locations benefit from two-way radio communications. While cell phones are often adequate, at times, they are woefully lacking. When the instant situation is exigent, team-wide awareness beyond earshot is important; in emergencies, it is essential. Then, when anybody talks, the whole team needs to hear.

Only public safety and amateur radio are truly expert in this communication domain. Of the two, the Commission specifically charges amateur radio with advancing the communication aspect of the radio art and increasing the public reservoir of trained radio operators... presumably, by including them into amateur radio itself. Amateur radio achieves this. Since its official founding (spawned by the Titanic tragedy in 1912) amateur radio has been *advancing the skills in both the communications and technical phases of the art*.

In emergency situations, communication skills are mandatory for all community service volunteers. They are not fully ready for service until they are trained in this phase of the radio art. While important, the technical aspects of the radio art are less urgent than learning emergency communications. Since training time is scarce and emergency preparedness is always pressing, the Tyro License is an adroit low risk solution to timely readiness.

The risk to other spectrum users cannot be ignored. Testing for technical competence is certainly a requisite for amateurs allowed to adjust their transmissions in ways that could cause interference. The Tyro License, ARCS Architecture and ARCS Sub-band spectrum effectively mitigates that risk. For amateur radio to shoulder the responsibility for their equipment's risk-free performance has worked for decades.

While the ARCS Initiative does not free the Tyro Licensee from responsibility for their complaint transmissions, it does transfer some dependence to others within the amateur radio team: the better trained higher class licensees on the various committees charged with reviewing the efficacy of commercial ARCS equipment prior to its sale. Again, this is only marginally different from what has been successful for decades.

While it was not immediately apparent, the Tyro License is a more generalize answer for the public's fair use of its own spectrum than community service use alone. All persons wanting to improve their communication and technical skills in the radio arts and use two-way radio for non-pecuniary traffic would be well advised to use this License as an entry into the amateur radio community. There they will find help. With the ARCS Architecture many diverse interest groups can share this spectrum with little chance of conflict. The digital station identification requirement will virtually preclude anonymous transmission and mitigate the Commission's enforcement burden. Unlike the personal radio services, amateur radio itself is already the front-line of code enforcement in this Service.

Thus, the Tyro License added to the current incentive license regime gives amateur radio access to new recruits while supplying needed communications to community service organizations. The Tyro License recognizes the elemental value of communications. Arguably, that is the appropriate entry into amateur radio. New technology reduces the technical risks of the past... thus, requiring less technical entry demand. Meanwhile, the path to technical cogency is already codified in the existing incentive licensing strategy. This begins a new paradigm benefiting the whole public.

No other radio service is prepared to do this. Only the Amateur Radio Service has a mandate to enhance the public value of the radio art through *voluntary noncommercial service, particularly with respect to providing emergency communications*. The *for-profit services* (GMRS, MURS, FRS, Business and Industrial) do not have the available spectrum or vision... nor, are they charged with such societal needs. Their spectrum cannot provide a platform for nation-wide – let alone world-wide – radio infrastructure. Foremost however, the *for-profit services* do not have an established infrastructure of trained willing altruistic people. Amateur radio is unique.

The technology suggested by the ARCS Initiative is very attractive to community service organizations. And it will benefit all of amateur radio. The *ad hoc trunking* with its call priority and digital group collection allows the sharing of radio infrastructure and its cost among otherwise diverse groups. CERT can share systems with the Red Cross, Salvation Army, Habitat for Humanity, the Boy Scouts and many more without conflict. All share the same repeaters and spectrum. Most of the time, they will not be aware of their individual activities. Yet, when they need to join in a crisis, that can be accomplished in seconds.

Ubiquitous nation-wide interoperability with world-wide possibilities is ideal for community service. For our volunteers to help a remote group with their crisis using instantly compatible radios was an impossible hope. The possibility of such infrastructure along all Interstate Highways would benefit both community service volunteers and all other amateurs. It is not hard to see how such a resource could help manage the public risks of mass exodus before a hurricane, flood or fire. The Commission requiring governments to give reasonable access to highway medians and mountain tops would establish a facilitating ethic. These benefits and more are possible with the ARCS Initiative.

Amateur radio is the cohesive agent bringing all the diverse community service organizations together. The Initiative even allows public safety inclusion when required. I hereby encourage the Commission to change the rules to include the ARCS Initiative suggestions.

Respectfully submitted,

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